

**REMARKS**

The Applicant thanks the Examiner for the courteous interview of 2 June 2008. The foregoing Amendment is made as a result of the interview.

**A. Claims 1, 2, 4, 7 and 12 were rejected under 35 U.S.C. §102(b) as being anticipated by Roberts et al. (US 5,440,648). The applicant respectfully traverses this rejection for the following reason(s).**

**Claim 1**

Claim 1 called for *a multiplexer allotting identification information to each of the picture signals received from the cameras, said identification information being represented by a predetermined number of proper identification bits and a total number of auxiliary bits equal in number to said predetermined number of proper identification bits, said predetermine number of proper identification bits being defined in number so that a number of available identifications is twice or more than the total number of available cameras, said proper identification bits identifying which camera generated a corresponding picture signal.*

Where claim 1 called for *a predetermined number of proper identification bits ... said proper identification bits identifying which camera generated a corresponding picture signal*, the Examiner has referred to Roberts' eight bits of pixel coordinate as corresponding to the *predetermined number of proper identification bits*, however these "bits of pixel coordinate" fail to anticipate the requirement that *said proper identification bits* have the function of *identifying which camera*

*generated a corresponding picture signal.*

Here the Examiner refers us to Roberts' col. 12, lines 49-54, which disclose that multiplexer and interface unit 38 adds four more coordinate bits identifying the camera from which the data record is read to increase the record bits to twenty-four total bits transmitted from the unit 38 to the image processing unit 42. These additional 4 bits in Roberts are not a part of the "eight bits of pixel coordinate" already deemed by the Examiner to correspond to the *predetermined number of proper identification bits*.

Instead, the "eight bits of pixel coordinate" refer to a predetermined number of bits of a pixel coordinate. Thus, applying the Examiner's holding that the "eight bits of pixel coordinate" correspond to the claimed *predetermined number of proper identification bits*, the foregoing feature of claim 1 would read:

*a multiplexer allotting identification information to each of the picture signals received from the cameras, said identification information being represented by "eight bits of pixel coordinate" and "eight bits of pixel intensity" equal in number to said "eight bits of pixel coordinate", said "eight bits of pixel coordinate" being defined in number so that a number of available identifications is twice or more than the total number of available cameras, said "pixel coordinate" identifying which camera generated a corresponding picture signal.*

Clearly the "pixel coordinate" does not identify *which camera generated a corresponding picture signal*. In fact, the "eight bits of pixel coordinate" in Roberts' col. 12, lines 43-45 are 8 of

20 bits disclosed in col. 12, lines 43-49. None of those 20 bits identify *which camera generated a corresponding picture signal*.

This required the Examiner's to further reference to Roberts' col. 12, lines 49-54, which disclose that multiplexer and interface unit 38 adds **four more coordinate bits** identifying the camera from which the data record is read, the foregoing feature of claim 1 would read:

*a multiplexer allotting identification information to each of the picture signals received from the cameras, said identification information being represented by "eight bits of pixel coordinate" and "eight bits of pixel intensity" equal in number to said "eight bits of pixel coordinate", said "eight bits of pixel coordinate" being defined in number so that a number of available identifications is twice or more than the total number of available cameras, said "four more coordinate bits" identifying which camera generated a corresponding picture signal.*

Clearly there is no antecedent in the above for "said four more coordinate bits".

Therefore, the "said four more coordinate bits" does not correspond to the "eight bits of pixel coordinate" referenced earlier.

"There must be no difference between the claimed invention and the reference disclosure, as viewed by a person of ordinary skill in the field of the invention." *Scripps clinic & Research Foundation v. Genentech, Inc.*, 927 F.2d 1565, 18 USPQ2d 1001, 18 USPQ2d 1896 (Fed. Cir. 1991).

We note that the Examiner is not a person of ordinary skill in the field of the invention.

Accordingly, the rejection of claim 1 is deemed to be in error and should be withdrawn.

**Claim 2**

Claim 2 required that *said multiplexer is a parallel to serial multiplexer*.

The Examiner merely refers to item 38 in Fig. 1, which fails to illustrate *a parallel to serial multiplexer*. Looking to Roberts' it is disclosed that the twenty-four-bit records assembled in the FIFOs 346 (Fig. 10) are transferred over the bus 40 to image processing unit 42 in eight-bit sequential bytes since the image processing unit 42, such as and OCULUS 500 MS board, can only receive data words having eight bits. See col. 13, lines 61-65. As can be seen from Fig. 1, the output of multiplexer and interface unit 38 is transmitted over bus 40.

Accordingly, the output of multiplexer and interface unit 38 is not the result of parallel-to-serial conversion. Therefore, multiplexer and interface unit 38 is not *a parallel to serial multiplexer*.

Accordingly, the rejection of claim 2 is deemed to be in error and should be withdrawn.

**Claim 7**

Claim 7 required that *the logical values of said auxiliary bits are opposite to the logical values of said proper identification bits*.

Here the Examiner refers us to Roberts' col. 12, lines 43-45 which state:

Each pixel record in the FIFOs 130a and 130b includes on end of line bit (EOL), eight bits of pixel coordinate, and eight bits of pixel intensity.

Nowhere in the foregoing cited section of Roberts is there any mention of the logical values of the various bits. Additionally, a review of Roberts' disclosure fails to find any disclosure that *the logical values of said "pixel intensity" bits are opposite to the logical values of said "pixel*

coordinate" *bits*.

Accordingly, the rejection of claim 7 is deemed to be in error and should be withdrawn.

### **Claim 12**

Claim 12 required that *the logical values of said auxiliary bits are identical to the logical values of said proper identification bits*.

Here the Examiner refers us to Roberts' col. 12, lines 43-45. Note that the Examiner already applied Roberts' col. 12, lines 43-45 to claim 7 which called for opposite logical values, thus it is not clear how the Examiner can now refer to the same section of Roberts with respect to the requirement that the logical values be identical.

Regardless, a review of Roberts' disclosure fails to find any disclosure that *the logical values of said "pixel intensity" bits are identical to the logical values of said "pixel coordinate" bits*..

Accordingly, the rejection of claim 12 is deemed to be in error and should be withdrawn.

**B. Claims 1 and 4 were rejected under 35 U.S.C. §102(b) as being anticipated by Kim (US 6,912,351). The applicant respectfully traverses this rejection for the following reason(s).**

### **Claim 1**

Claim 1 called for *a multiplexer allotting identification information to each of the picture signals received from the cameras, said identification information being represented by a predetermined number of proper identification bits and a total number of auxiliary bits equal in*

*number to said predetermined number of proper identification bits, said predetermine number of proper identification bits being defined in number so that a number of available identifications is twice or more than the total number of available cameras, said proper identification bits identifying which camera generated a corresponding picture signal.*

Where claim 1 called for *a predetermined number of proper identification bits*, the Examiner has referred to Kim's "PHYSICAL ADDRESS= eight bits= 10000000 of fig. 5" and has also referred to Kim's "CAMERA ID CODE has 0001 bits" with respect to the claimed feature of *said proper identification bits identifying which camera generated a corresponding picture signal*.

Clearly Kim's "PHYSICAL ADDRESS= eight bits= 10000000 of fig. 5" is not the same as Kim's "CAMERA ID CODE has 0001 bits".

If we consider Kim's "CAMERA ID CODE has 0001 bits" to correspond to the claimed *proper identification bits*, it is clear that there are a total of 4 bits. thus Kim fails to satisfy the limitation requiring *a total number of auxiliary bits equal in number to said predetermined number of proper identification bits*, wherein it is noted that the Examiner has indicated that Kim's "CORRESPONDING I-PICTURE ADDRESS= eight bits = 00000000 of fig. 6" correspond to the claimed *total number of auxiliary bits*.

Accordingly, the rejection of claim 1 is deemed to be in error and should be withdrawn.

**C. Claims 3, 5 and 6 were rejected under 35 U.S.C. §103(a), as rendered obvious and unpatentable, over Roberts et al. in view of Cotton et al. (US 4,630,110). The Applicant respectfully traverses this rejection for the following reason(s).**

Cotton fails to provide a teaching of the features noted above as lacking in Roberts with respect to claim 1. Accordingly, claims 3, 5 and 6 are deemed to be non-obvious for the same reasons that claim 1 is not anticipated by Roberts.

Accordingly, the rejection is deemed to be in error and should be withdrawn.

**D. Claims 8-16 were rejected under 35 U.S.C. §103(a), as rendered obvious and unpatentable, over Roberts et al. in view of "Applicant's admitted prior art" (AAPA). The Applicant respectfully traverses this rejection for the following reason(s).**

The AAPA fails to provide a teaching of the features noted above as lacking in Roberts with respect to claim 1. Accordingly, claims 3, 5 and 6 are deemed to be non-obvious for the same reasons that claim 1 is not anticipated by Roberts.

Accordingly, the rejection is deemed to be in error and should be withdrawn.

**E. Claims 2, 5 and 6 were rejected under 35 U.S.C. §103(a), as rendered obvious and unpatentable, over Kim. The Applicant respectfully traverses this rejection for the following reason(s).**

As noted above, Kim fails to anticipate claim 1, therefore claims 2, 5 and 6 are deemed to be non-obvious for the same reasons that Kim fails to anticipate claim 1.

Accordingly, the rejection is deemed to be in error and should be withdrawn.

**F. Claims 1-8, 12 and 13 were rejected under 35 U.S.C. §103(a), as rendered obvious and unpatentable, over Tsugane et al. (US 4,961,211) in view of Cooper et al. (US 5,870,139) . The Applicant respectfully traverses this rejection for the following reason(s).**

**Claim 1**

The Examiner refers us to Cooper et al. (*hereafter: Cooper*) with respect to the feature of *a picture signal storage medium for storing the picture signals and allotted identification information output from the multiplexer*, as set forth in claim 1. The Examiner refers us to Tsugane with respect to the remaining features of claim 1.

Claim 1 called for *a multiplexer allotting identification information to each of the picture signals received from the cameras, said identification information being represented by a predetermined number of proper identification bits and a total number of auxiliary bits equal in number to said predetermined number of proper identification bits, said predetermine number of proper identification bits being defined in number so that a number of available identifications is twice or more than the total number of available cameras, said predetermined proper identification bits identifying which camera generated a corresponding picture signal.*

Here the Examiner refers' to Tsugane's teaching of multiplexer 104 (Fig. 1) the IDM monitor as a plurality of proper identification bits having 2 bits and DV as auxiliary information having 14 bits.

Then the Examiner holds that the total number of bits in Tsugane is 16 bits ( IDM + DV = 2 + 14 = 16) corresponds to the claimed *predetermined number of proper identification bits*. If this



were the case then there would also have to be an equal number of total number of auxiliary bits. However, as already noted by the Examiner, Tsugane teaches only 14 auxiliary bits, i.e., the digital voice information DV.

Additionally, note that Tsugane teaches the monitor ID signal IDM consisting of a 2-bit binary code  $B_0, B_1$  (which is all that is needed since there are only 4 monitors 31-35) and corresponds to the camera ID signal IDC consisting of the same 2-bit binary code  $B_0, B_1$  (which is all that is needed since there are only 4 cameras 5, 6, 7 and 8).

Since claim 1 requires *said predetermined proper identification bits identifying which camera generated a corresponding picture signal*, then Tsugane teaches that the camera identifying bits total 2 bits (2-bit binary code  $B_0, B_1$ ). Thus it holds that in Tsugane the *predetermined number of proper identification bits* = 2 bits, and for Tsugane to satisfy the limitation that *a total number of auxiliary bits equal in number to said predetermined number of proper identification bits* then Tsugane can only have a total of 2 bits for the auxiliary bits deemed by the Examiner to correspond to the digital voice information DV, which has 14 bit (14 bits  $\neq$  2 bits).

Accordingly, the rejection of claim 1 is deemed to be in error and should be withdrawn.

Claims 2-8, 12 and 13 are deemed to be non-obvious for the same reasons as claim 1.


**G. Claims 10 and 15 were rejected under 35 U.S.C. §103(a), as rendered obvious and unpatentable, over Tsugane et al. (US 4,961,211) in view of Cooper et al. (US 5,870,139). The Applicant respectfully traverses this rejection for the following reason(s).**

Claims 10 and 15 are deemed to be non-obvious for the same reasons as claim 1.

The examiner is respectfully requested to reconsider the application, withdraw the objections and/or rejections and pass the application to issue in view of the above amendments and/or remarks.

Should a Petition for extension of time be required with the filing of this Amendment, the Commissioner is kindly requested to treat this paragraph as such a request and is authorized to charge Deposit Account No. 02-4943 of Applicant's undersigned attorney in the amount of the incurred fee if, **and only if**, a petition for extension of time be required **and** a check of the requisite amount is not enclosed.

Respectfully submitted,

  
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